

2 EDWARD "COACH" WEINHAUS, ESQ.
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6 Plaintiff in Pro Per

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

11 EDWARD "COACH" WEINHAUS,
12 Plaintiff,
13 v.
14 REGENTS OF THE UNIVERSITY
15 CALIFORNIA,
Defendant.

Case No. 2:25-cv-00262 JFW (ASx)

**DECLARATION OF EDWARD
“COACH” WEINHAUS IN
SUPPORT OF PLAINTIFF’S
PARTIAL OPPOSITION TO
DEFENDANTS’ EX PARTE
APPLICATION TO EXTEND
DEADLINES**

Judge: John F. Walter
Mag. Judge: Alka Sagar
Crtrm.: 7A
Trial Date: Not Set

I, Edward "Coach" Weinhaus, declare as follows.

1. I am a partner at law firm LegalSolved LLC. I am licensed in California, Missouri, Illinois, and licensed to practice before this Court. I am the Plaintiff in this matter. I have personal knowledge of the following facts, and if called as a witness, could and would testify competently thereto.

2. On March 6, 2025, at the conference described by Defendants, Plaintiff and his co-counsel Mr. Florek informed Defendants that they would pursue a default should Defendants miss the deadline for filing the motion to dismiss.

3. On March 17, 2025, Defendant missed its filing deadline at 4pm.

4. On March 17, 2025, immediately thereafter Plaintiff reached out via email to

1 Defendants to conference the procedural issue pursuant to Local Rule.
2 5. Defendants ignored Plaintiff's email.
3 6. The next day, the Court issued its ruling denying the Motion to Dismiss for
4 other reasons.
5 7. Defendants continued to ignore Plaintiff's emails to conference.
6 8. Plaintiff placed multiple calls to Defendants' counsel.
7 9. Defendants waited until Friday March 21 to respond.
8 10. Plaintiffs agreed not to pursue Defendants for default prior to the conference,
9 which the parties ultimately scheduled for April 1, 2025.
10 11. Defendants requested Plaintiff agree to grant an extension of two deadlines –
11 the Rule 26 Conference, and their own dispositive motion deadline.
12 12. Plaintiff immediately agreed to Rule 26 extension and sent a revised motion
13 largely the same form as **Exhibit 1** to this declaration but for ¶3 which has added in
14 the April 1 conference date.
15 13. Defendants would not agree to the Joint Motion in Exhibit 1.
16 14. Rather, Defendants insisted to communicate to the Court that it wanted its
17 dispositive motion deadline extended without disclosing to the Court that its first
18 deadline had been missed.
19 15. Plaintiffs object to the request for the reasons stated in the Opposition filed
20 herewith and maintained that Plaintiff would not pursue default until after the
21 conference, if at all.
22 16. Plaintiff also explained to Defendant's counsel that rules of candor require the
23 Court be informed that Defendant had missed its own filing deadline if it indeed
24 sought an extension.
25 17. Plaintiff communicated this requirement to Defendants' counsel no fewer
26 than three times.

27 I declare under penalty of perjury under the laws of the State of California
28 and the United Kingdom, where I now sit, that the foregoing is true and correct.

1 Executed on this 26th Day of March 2025, at London, England, the United
2 Kingdom.

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5 By: /s/Edward “Coach” Weinhaus/s/
6 EDWARD “COACH” WEINHAUS, ESQ
7 Plaintiff
CA BAR# 330344

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